



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 12, 2024

VIA ECF

The Honorable Sidney H. Stein
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: CBS Broadcasting Inc. v. U.S. Department of Justice, et al., 23-cv-7003 (SHS)

Dear Judge Stein:

This Office represents the U.S. Department of Justice, Federal Bureau of Prisons, and Federal Bureau of Investigation (the "Defendants") in the above-referenced action brought under the Freedom of Information Act ("FOIA"). On behalf of all parties, the Defendants respectfully submit this joint request to adjourn the March 21, 2024, status conference to a time convenient for the Court during the second week of May. As summarized in the March 11 joint status letter (ECF No. 30), the parties have been working together cooperatively to address plaintiff's FOIA requests and have agreed to a production schedule for the next several weeks. As such, the parties respectfully submit that it would be more productive to have the next status conference in early to mid-May, after the Defendants have had an opportunity to make additional FOIA releases pursuant to the parties' agreement. Accordingly, the parties respectfully request adjourning the March 21 status conference to the second week of May, subject to the Court's availability. This is the parties' first request to adjourn the March 21 status conference, and the requested adjournment will not affect any other dates or deadlines.

We thank the Court for its consideration of this request.

The conference is adjourned to May 14, 2024, at 4:00 p.m.

**Dated: New York, New York
March 12, 2024**

SO ORDERED:

Sidney H. Stein, U.S.D.J.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Carly Weinreb
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Cc: Matthew Lynn Schafer, Esq., *Attorney for Plaintiff* (by ECF)